

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION**

**WENDY KIRKLAND,**

Plaintiff,

v.

**JOHNSON & JOHNSON, JOHNSON &  
JOHNSON CONSUMER, INC., IMERYS TALC  
AMERICA, INC.,**

Defendants.

**MDL NO. 16-2738 (FLW) (LHG)  
JUDGE FREDA L. WOLFSON  
MAG. JUDGE LOIS H.  
GOODMAN**

**COMPLAINT AND JURY DEMAND**

Civil Action No.: 3:17-cv-04953-FLW-LHG

**DIRECT FILED ACTION**

**NOTICE OF FILING SHORT FORM COMPLAINT**

Plaintiff hereby gives notice that pursuant to Case Management Order No. 3 (Filing of Short Form Complaints) that the Short Form Complaint and Jury Demand was filed in the above-referenced case on July 6, 2017 on behalf of Plaintiff, Wendy Kirkland.

Dated: August 31, 2017

Respectfully submitted,

/s/ Eric D. Pearson

Eric D. Pearson

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**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

/s/ Eric D. Pearson

Eric D. Pearson

ATTORNEY FOR PLAINTIFF